

# **EXHIBIT C**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

**JUSTIN EVERETT.**

**Plaintiff,**

v.

**FIELDWORKS, INC., LAURA  
BARKLEY, ZACHARY REIDER, CHRIS  
GALLAWAY and LAURA MOORMAN.**

**Defendants.**

**Civil Action No. 2:17-cv-01495-PJP**

**DECLARATION OF LAURA MOORMAN, née BARKLEY)**

I, Laura Moorman, hereby declare and state the following:

1.

My name is Laura Moorman, née Barkley.

2.

I reside in Cincinnati, Ohio, and have resided here for approximately 6 years, i.e., since June 2013.

3.

I served as the Office Director of FieldWorks in Pittsburgh from August 25, 2016 to October 10, 2016.

4.

Upon commencement of my duties in the Pittsburgh office, I learned that FieldWorks decided to terminate Plaintiff for registering numerous individuals to vote who he had already registered.

5.

I was instructed to terminate Plaintiff accordingly from the data entry team in Philadelphia.

6.

FieldWorks did not replace Plaintiff with a Caucasian employee nor did FieldWorks replace him with a female employee.

7.

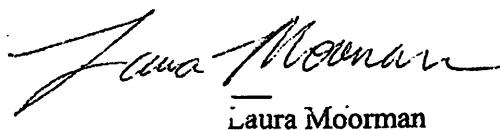
I had no other interaction with Plaintiff and had no oversight over Plaintiff's employment.

I conduct no regular business, nor do I have any contacts, in Pennsylvania.

9. Following the voter registration deadline for the 2016 election, the FieldWorks Pittsburgh office was closed as it had fulfilled its sole purpose – to collect complete voter registration cards from citizens in the Pittsburgh area who need to register or update their registration.

10. I am currently unemployed.

I, Laura Moorman, declare under penalty of perjury that the foregoing is true and correct.



Laura Moorman

Dated: 2-15-2018, 2018